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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF LOS ANGELES  
10

11 OMAR RODRIGUEZ; CINDY GUILLEN-  
GOMEZ; STEVE KARAGIOSIAN;  
12 ELFEGO RODRIGUEZ; AND JAMAL  
CHILDS,

13 Plaintiffs,  
14

15 -vs-

16 BURBANK POLICE DEPARTMENT; CITY  
OF BURBANK; AND DOES 1 THROUGH  
17 100, INCLUSIVE.

18 Defendants.  
19

20 BURBANK POLICE DEPARTMENT; CITY  
OF BURBANK,

21 Cross-Complainants,  
22

23 -vs-

24 OMAR RODRIGUEZ, and Individual,  
25

26 Cross- Defendant.  
27  
28

(SPACE BELOW FOR FILING STAMP ONLY)

CITY ATTORNEY

2012 MAR 19 PM 3:39

CASE NO.: BC 414 602

Assigned to: Hon. Joanne B. O'Donnell, Judge  
Dept. 37

Complaint Filed: May 28, 2009

PLAINTIFF STEVE KARAGIOSIAN'S  
OPPOSITION TO DEFENDANT'S MOTION  
IN LIMINE NO. 12 TO EXCLUDE  
TESTIMONY OF R. WILLIAM MATHIS;  
DECLARATION OF SOLOMON E. GRESEN

Trial Date: March 19, 2012

1                                   **MEMORANDUM OF POINTS AND AUTHORITIES**

2           In Defendant's Motion in Limine No. 12, Defendant seeks an order barring Plaintiff from  
3 introducing any testimony from R. William Mathis, Plaintiff's expert witness regarding his  
4 emotional and psychological damages suffered as a result of harassment and discrimination, on the  
5 grounds that Defendant has not been provided with copies of Dr. Mathis' report and raw test data.  
6 However, as is demonstrated in the attached Declaration of Solomon E. Gresen and the exhibit  
7 attached thereto, once Dr. Mathis returned from vacation, his report and test data were provided to  
8 Defendant. Defendant's motion has thus become moot.

9           Therefore, Plaintiff respectfully requests that the Court deny Defendant's Motion *in Limine*  
10 No. 12.

11  
12 DATED: March 15, 2012

LAW OFFICES OF RHEUBAN & GRESEN

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14 By: Steven M. Cischke  
15 Steven M. Cischke  
16 Attorneys for Plaintiff, Steve Karagiosian  
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# **EXHIBIT A**

## Solomon Gresen

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**From:** Solomon Gresen  
**Sent:** Friday, February 24, 2012 5:18 PM  
**To:** 'Michaels, Larry'; Philip L. Reznik (preznik@brgslaw.com)  
**Cc:** Corey Hayden; Steven Rheuban  
**Subject:** Mathis Testing and Report  
**Attachments:** Email from Dr. Mathis.pdf; MMPI-2.pdf; Protective Order.pdf

Mr. Michaels and Mr. Resnick,

Dr. Mathis has returned from his vacation, and has provided me with his raw test data and report. Copies are attached.

Also, please find a copy of the protective order executed by Dr. Mathis.

Solomon E. Gresen, Esq.  
LAW OFFICES OF RHEUBAN & GRESSEN  
15910 Ventura Boulevard, Suite 1610  
Encino, California 91436  
tel: 818.815.2727  
fax: 818.815.2737  
[seg@rglawyers.com](mailto:seg@rglawyers.com)  
[www.rglawyers.com](http://www.rglawyers.com)

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**Dr. Bill Mathis**

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To: Solomon Gresen (seg@rglawyers.com)  
Subject: Summary MMPI Results - Steve Karagosian

February 24, 2012

TO: Solomon Gresen, Attorney  
FROM: William Mathis, PhD  
RE: Summary MMPI Results/Steve Karagosian

The MMPI report is consistent with this examiner's expectations, that little will be different from earlier evaluation and using the examination by Mr. Reznik on 6/7/2012. Mr. Karagosian doesn't admit to many issues that currently impinge on his life and remains excessively protective and reluctant to admit any psychological distress. His reluctance appears to under estimate his problems as stated in most of his clinical interview.

His clinical profile is within normal limits but his denial of pressures and stresses may indicate the extent to which his is protective or dismissive of how outside pressures of work affect him psychologically. He is concerned about his health. It is not likely retesting will demonstrate change in the profile.

Dr. Mathis

Dr. Bill Mathis

3435 Valle Verde Dr., Napa, CA 94558  
707-252-2151 office; 707-252-1349 fax  
[www.MathisGroup.net](http://www.MathisGroup.net)

*"When it is obvious that the goals cannot be reached, don't adjust the goals, adjust the action steps." ~ Confucius quote ~*

# MMPI-2<sup>®</sup>

Minnesota Multiphasic  
Personality Inventory-2

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## Personal Injury Interpretive Report

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MMPI-2

The Minnesota Report<sup>™</sup>: Reports for Forensic Settings

*James N. Butcher, PhD*

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ID Number:	STEVEK
Age:	37
Gender:	Male
Marital Status:	Married
Years of Education:	15
Date Assessed:	06/30/2011

**PEARSON**

**PsychCorp**

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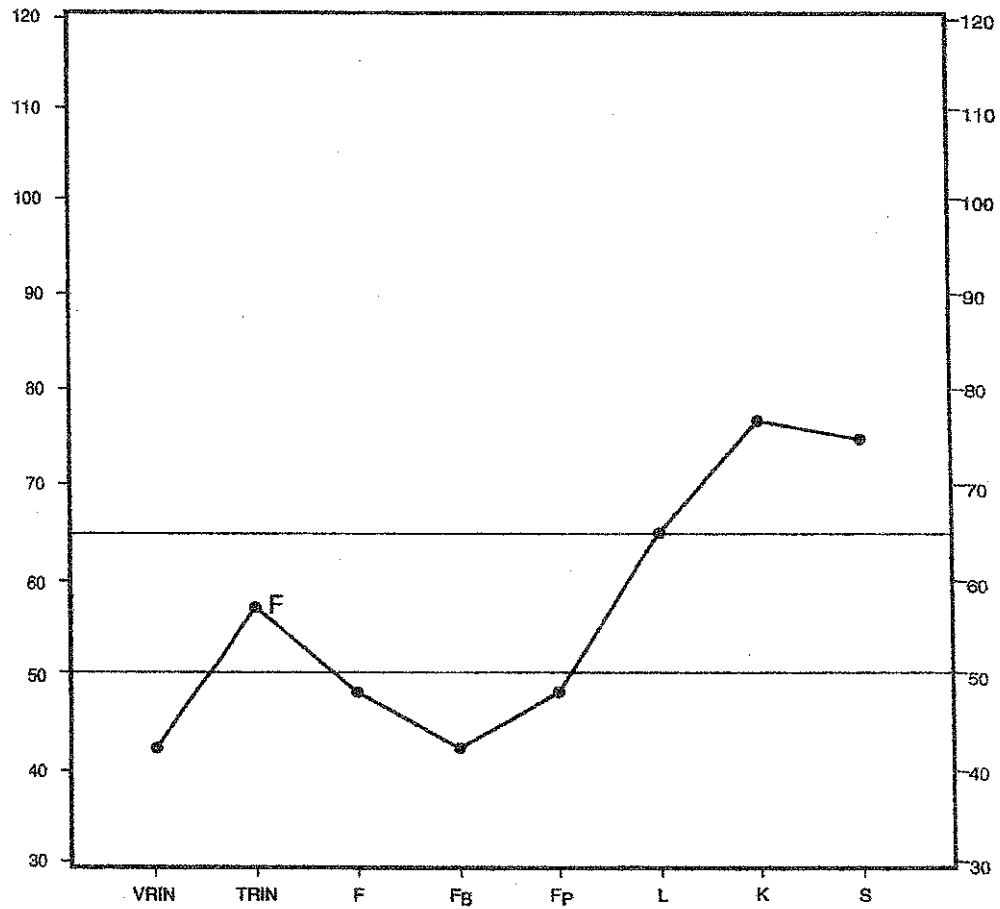
Minnesota Multiphasic Personality Inventory and MMPI are registered trademarks and The Minnesota Report is a trademark of the University of Minnesota. Pearson, the PSI logo, and PsychCorp are trademarks in the U.S. and/or other countries of Pearson Education, Inc., or its affiliate(s).

### TRADE SECRET INFORMATION

Not for release under HIPAA or other data disclosure laws that exempt trade secrets from disclosure.

[3.8/1/2.63]

### MMPI-2 VALIDITY PATTERN



Raw Score:	3	8	4	0	1	7	28	47
T Score (plotted):	42	57F	48	42	48	65	77	75
Non-Gendered T Score:	42	57F	50	42	49	66	77	76
Response %:	100	100	100	100	100	100	100	100

Cannot Say (Raw): 0  
Percent True: 29  
Percent False: 71

	Raw Score	T Score	Resp. %
S <sub>1</sub> - Beliefs in Human Goodness	14	67	100
S <sub>2</sub> - Serenity	12	72	100
S <sub>3</sub> - Contentment with Life	7	65	100
S <sub>4</sub> - Patience/Denial of Irritability	8	68	100
S <sub>5</sub> - Denial of Moral Flaws	5	65	100



## PROFILE VALIDITY

This is a highly defensive profile of questionable clinical validity. The client was extremely reluctant to disclose personal information and tended to minimize personal faults. It is likely that his uncooperativeness and rigid defensiveness resulted in an underestimate of his problems.

The client appears to be quite unwilling or unable to view himself psychologically and has little insight into his behavior. Individuals with this level of defensiveness do not view themselves as being in need of behavior change. They typically do not seek psychological treatment on their own and are reluctant to get very involved if they are pushed into therapy. The following narrative report should be considered an understatement of the individual's current level of personality functioning and problems, although it may suggest problem areas that should be further evaluated.

## SYMPTOMATIC PATTERNS

This MMPI-2 clinical profile is within normal limits. The client did not report psychological conflicts or situational stresses that are producing great difficulty for him at this time. He views himself as dealing effectively with his life situation, and he seems to be obtaining sufficient satisfaction out of life at this point.

He may be somewhat concerned about his health, or he may be experiencing some physical problems or focal symptoms at this time. He may complain a great deal and seem dissatisfied with life.

In addition, the following description is suggested by the content of the client's item responses. He reports that his work situation is generally satisfactory. No significant negative work attitudes requiring treatment attention were noted in his item content.

## INTERPERSONAL RELATIONS

Quite outgoing and sociable, he has a strong need to be around others. He is gregarious and enjoys attention. Personality characteristics related to social introversion-extraversion tend to be stable over time. The client is typically outgoing, and his sociable behavior is not likely to change if he is retested at a later time.

## MENTAL HEALTH CONSIDERATIONS

This profile is within normal limits, and no clinical diagnosis is provided.

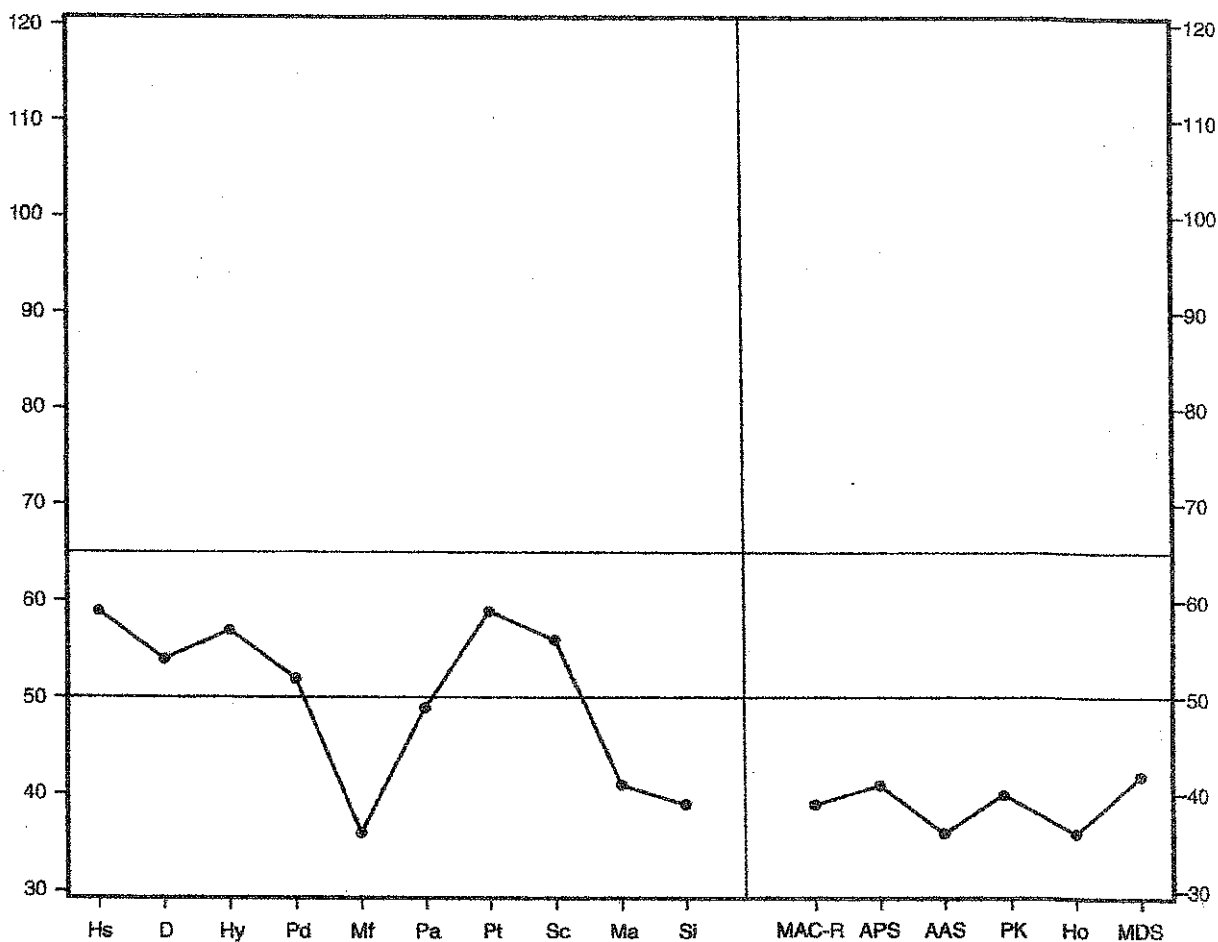
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## PERSONAL INJURY CONSIDERATIONS

His performance on the MMPI-2 validity indicators calls for caution in interpreting his profile. Like some people who are involved in personal injury litigation, he presented himself in a very glowing manner, seemingly to avoid disclosing any personality faults or personal problems he might be experiencing. Any disposition based on his MMPI-2 scores should bear in mind that he may have personal problems that he did not reveal.

To a great extent, his MMPI-2 scores probably represent an underestimate of his personal problems. This test protocol is therefore not likely to provide much information about his adjustment that would be useful in case determination. Caution should be used in making recommendations in which his psychological adjustment might be critical. More careful evaluation is required to obtain information that does not rely on his cooperation through self-report. If his cooperation can be assured, however, a retesting with the MMPI-2 might be valuable.

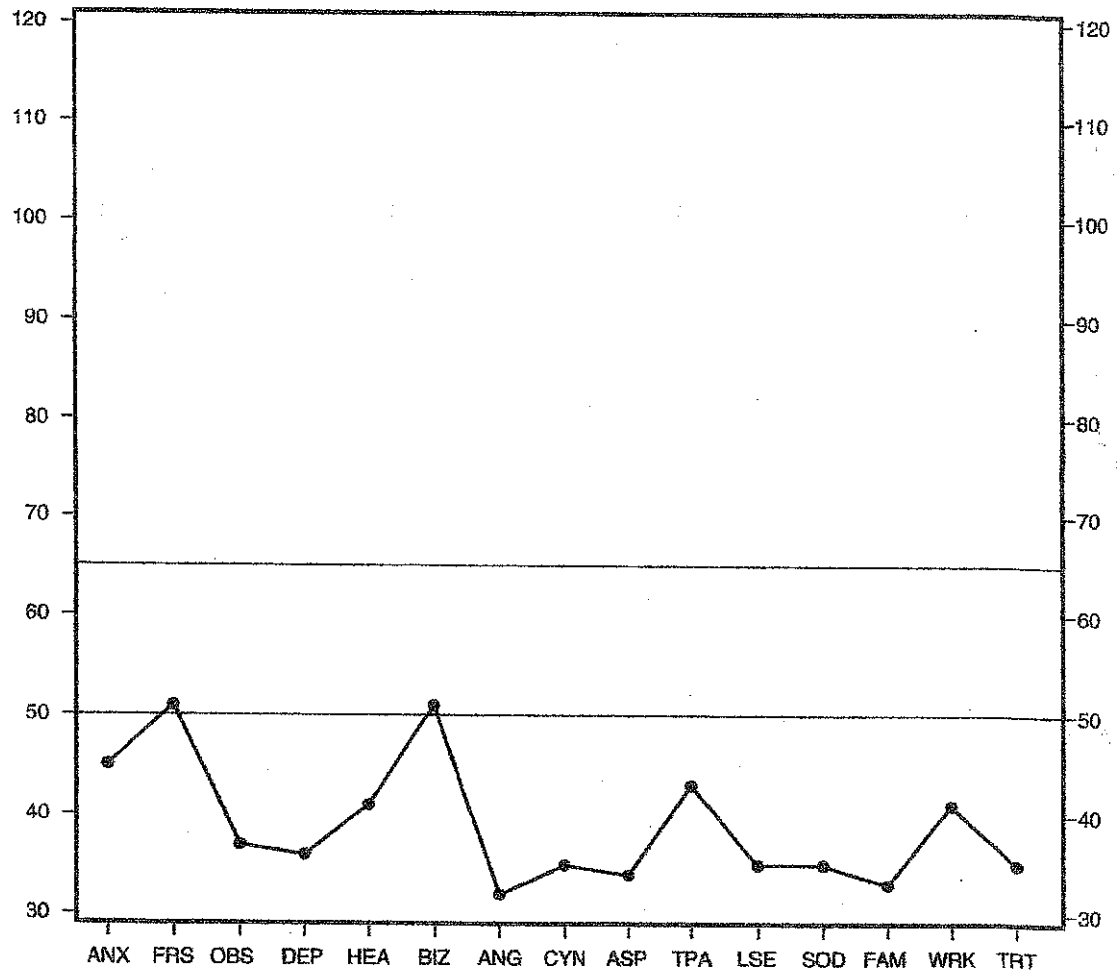
### MMPI-2 CLINICAL AND SUPPLEMENTARY SCALES PROFILE



Raw Score:	2	20	24	13	19	10	3	2	10	15	16	20	0	2	7	1
K Correction:	14			11			28	28	6							
T Score (plotted):	59	54	57	52	36	49	59	56	41	39	39	41	36	40	36	42
Non-Gendered T Score:	58	52	55	53		49	58	57	42	38	41	41	38	40	37	42
Response %:	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100

Welsh Code: 17 3824/69:05# K'L+/-F:

Profile Elevation: 53.4

[illegible]

## ADDITIONAL SCALES

	Raw Score	T Score	Non-Gendered T Score	Resp %
<b>Personality Psychopathology Five (PSY-5) Scales</b>				
Aggressiveness (AGGR)	6	43	44	100
Psychoticism (PSYC)	2	45	45	100
Disconstraint (DISC)	11	42	47	100
Negative Emotionality/Neuroticism (NEGE)	4	41	40	100
Introversion/Low Positive Emotionality (INTR)	8	43	44	100
<b>Supplementary Scales</b>				
Anxiety (A)	1	37	37	100
Repression (R)	18	56	55	100
Ego Strength (Es)	44	65	67	100
Dominance (Do)	18	55	55	100
Social Responsibility (Re)	24	60	59	100
<b>Harris-Lingoes Subscales</b>				
<b>Depression Subscales</b>				
Subjective Depression (D <sub>1</sub> )	5	45	44	100
Psychomotor Retardation (D <sub>2</sub> )	6	54	53	100
Physical Malfunctioning (D <sub>3</sub> )	3	51	50	100
Mental Dullness (D <sub>4</sub> )	1	43	43	100
Brooding (D <sub>5</sub> )	0	40	39	100
<b>Hysteria Subscales</b>				
Denial of Social Anxiety (Hy <sub>1</sub> )	6	61	62	100
Need for Affection (Hy <sub>2</sub> )	10	63	63	100
Lassitude-Malaise (Hy <sub>3</sub> )	1	43	43	100
Somatic Complaints (Hy <sub>4</sub> )	2	48	46	100
Inhibition of Aggression (Hy <sub>5</sub> )	3	48	47	100
<b>Psychopathic Deviate Subscales</b>				
Familial Discord (Pd <sub>1</sub> )	1	45	44	100
Authority Problems (Pd <sub>2</sub> )	3	47	50	100
Social Imperturbability (Pd <sub>3</sub> )	5	57	58	100
Social Alienation (Pd <sub>4</sub> )	3	45	44	100
Self-Alienation (Pd <sub>5</sub> )	0	34	34	100
<b>Paranoia Subscales</b>				
Persecutory Ideas (Pa <sub>1</sub> )	3	58	58	100
Poignancy (Pa <sub>2</sub> )	0	34	34	100
Naivete (Pa <sub>3</sub> )	7	60	60	100

	Raw Score	T Score	Non-Gendered T Score	Resp %
<b>Schizophrenia Subscales</b>				
Social Alienation (Sc <sub>1</sub> )	1	43	42	100
Emotional Alienation (Sc <sub>2</sub> )	1	50	49	100
Lack of Ego Mastery, Cognitive (Sc <sub>3</sub> )	0	42	42	100
Lack of Ego Mastery, Conative (Sc <sub>4</sub> )	1	44	44	100
Lack of Ego Mastery, Defective Inhibition (Sc <sub>5</sub> )	0	40	40	100
Bizarre Sensory Experiences (Sc <sub>6</sub> )	0	41	41	100
<b>Hypomania Subscales</b>				
Amorality (Ma <sub>1</sub> )	1	42	44	100
Psychomotor Acceleration (Ma <sub>2</sub> )	3	39	39	100
Imperturbability (Ma <sub>3</sub> )	4	53	54	100
Ego Inflation (Ma <sub>4</sub> )	1	37	37	100
<b>Social Introversion Subscales (Ben-Porath, Hostetler, Butcher, &amp; Graham)</b>				
Shyness/Self-Consciousness (Si <sub>1</sub> )	1	39	39	100
Social Avoidance (Si <sub>2</sub> )	0	37	37	100
Alienation--Self and Others (Si <sub>3</sub> )	1	38	38	100
<b>Content Component Scales (Ben-Porath &amp; Sherwood)</b>				
<b>Fears Subscales</b>				
Generalized Fearfulness (FRS <sub>1</sub> )	0	44	43	100
Multiple Fears (FRS <sub>2</sub> )	4	54	50	100
<b>Depression Subscales</b>				
Lack of Drive (DEP <sub>1</sub> )	0	40	40	100
Dysphoria (DEP <sub>2</sub> )	0	42	41	100
Self-Depreciation (DEP <sub>3</sub> )	0	41	41	100
Suicidal Ideation (DEP <sub>4</sub> )	0	45	46	100
<b>Health Concerns Subscales</b>				
Gastrointestinal Symptoms (HEA <sub>1</sub> )	0	44	44	100
Neurological Symptoms (HEA <sub>2</sub> )	0	40	40	100
General Health Concerns (HEA <sub>3</sub> )	1	48	49	100
<b>Bizarre Mentation Subscales</b>				
Psychotic Symptomatology (BIZ <sub>1</sub> )	1	54	54	100
Schizotypal Characteristics (BIZ <sub>2</sub> )	1	47	48	100
<b>Anger Subscales</b>				
Explosive Behavior (ANG <sub>1</sub> )	0	39	39	100
Irritability (ANG <sub>2</sub> )	0	35	35	100
<b>Cynicism Subscales</b>				
Misanthropic Beliefs (CYN <sub>1</sub> )	1	36	37	100
Interpersonal Suspiciousness (CYN <sub>2</sub> )	0	34	35	100

	Raw Score	T Score	Non-Gendered T Score	Resp %
<b>Antisocial Practices Subscales</b>				
Antisocial Attitudes (ASP <sub>1</sub> )	1	35	36	100
Antisocial Behavior (ASP <sub>2</sub> )	0	38	41	100
<b>Type A Subscales</b>				
Impatience (TPA <sub>1</sub> )	1	39	40	100
Competitive Drive (TPA <sub>2</sub> )	2	44	45	100
<b>Low Self-Esteem Subscales</b>				
Self-Doubt (LSE <sub>1</sub> )	0	39	40	100
Submissiveness (LSE <sub>2</sub> )	0	41	40	100
<b>Social Discomfort Subscales</b>				
Introversion (SOD <sub>1</sub> )	0	36	37	100
Shyness (SOD <sub>2</sub> )	1	41	41	100
<b>Family Problems Subscales</b>				
Family Discord (FAM <sub>1</sub> )	0	35	35	100
Familial Alienation (FAM <sub>2</sub> )	0	40	41	100
<b>Negative Treatment Indicators Subscales</b>				
Low Motivation (TRT <sub>1</sub> )	0	42	42	100
Inability to Disclose (TRT <sub>2</sub> )	0	37	38	100

Uniform T scores are used for Hs, D, Hy, Pd, Pa, Pt, Sc, Ma, the content scales, the content component scales, and the PSY-5 scales. The remaining scales and subscales use linear T scores.

### End of Report

NOTE: This MMPI-2 interpretation can serve as a useful source of hypotheses about clients. This report is based on objectively derived scale indices and scale interpretations that have been developed with diverse groups of people. The personality descriptions, inferences, and recommendations contained herein need to be verified by other sources of clinical information because individual clients may not fully match the prototype. The information in this report should only be used by a trained and qualified test interpreter. The report was not designed or intended to be provided directly to clients. The information contained in the report is technical and was developed to aid professional interpretation.

This and previous pages of this report contain trade secrets and are not to be released in response to requests under HIPAA (or any other data disclosure law that exempts trade secret information from release). Further, release in response to litigation discovery demands should be made only in accordance with your profession's ethical guidelines and under an appropriate protective order.

## ITEM RESPONSES

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# DIRECTIONS

- Use a No. 2 pencil only.
- Make solid marks that fill the circle completely.
- Make no stray marks on this form.
- Erase cleanly any marks you wish to change.

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12 Attorneys for Defendant and Cross-Complainant CITY OF BURBANK, including the  
13 POLICE DEPARTMENT OF THE CITY OF BURBANK (erroneously sued as an  
independent entity named "BURBANK POLICE DEPARTMENT")

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA

15 FOR THE COUNTY OF LOS ANGELES

16 OMAR RODRIGUEZ; CINDY GUILLEN-  
17 GOMEZ; STEVE KARAGIOSIAN; ELFEGO  
RODRIGUEZ; AND JAMAL CHILDS,

18 Plaintiffs,

19 v.

20 BURBANK POLICE DEPARTMENT; CITY  
21 OF BURBANK; AND DOES 1 THROUGH  
100, INCLUSIVE,

22 Defendants.

23 BURBANK POLICE DEPARTMENT; CITY  
24 OF BURBANK,

25 Cross-Complainants,

26 v.

27 OMAR RODRIGUEZ, an Individual;

28 Cross-Defendant.

Case No. BC 414602

Judge: The Honorable Joanne O'Donnell  
Location: 37

STIPULATION FOR PROTECTIVE ORDER  
RE: CONFIDENTIAL INFORMATION  
PRODUCED BY DEFENDANT BURBANK  
TO PLAINTIFF STEVE KARAGIOSIAN  
FOLLOWING IN CAMERA REVIEW;  
[PROPOSED] REFEREE  
RECOMMENDATION; [PROPOSED]  
ORDER

File Date: May 28, 2009  
Trial Date: April 13, 2011 (Plff. Guillen);  
June 8, 2011 (Plff. Karagiosian);  
July 27, 2011 (Plff. O. Rodriguez)

Discovery Referee: Hon. Diane Wayne, Ret.

1 IT IS HEREBY ORDERED AS FOLLOWS:

2 1. This Protective Order applies to and governs the use and disclosure of the  
3 following Confidential Information which the Court ordered Defendant City of Burbank<sup>1</sup>  
4 ("Burbank" or "Defendant") to disclose to Plaintiff Steve Karagiosian ("Karagiosian" or  
5 "Plaintiff"):

6 a. Memorandum from Irma Rodriguez Moisa to Police Chief Tim Stehr and  
7 Chief Assistant City Attorney Juli Scott, dated May 20, 2008.

8 b. Investigative report prepared for City of Burbank and submitted by Sergio  
9 Bent, Esq., dated January 27, 2009.

10 c. Audio recordings of Sergio Bent's interviews with Steve Karagiosian, dated  
11 August 11, 2008, August 26, 2008, and November 25, 2008.

12 2. The term "Confidential Information" shall mean and include the documents listed  
13 in Paragraphs 1(a) through (c) above, any and all portions thereof, and all documents of whatever  
14 kind containing information set forth in or obtained from these documents. Burbank shall mark  
15 any documents produced that constitute or contain Confidential Information with a label  
16 designating them as "Confidential: Subject to Protective Order."

17 3. The term "Action" shall mean *Rodriguez et al. v. Burbank Police Department et*  
18 *al.*, Los Angeles Superior Court Case No. BC 414602.

19 4. The term "Plaintiff" shall mean Steve Karagiosian, a plaintiff in this Action.

20 5. The term "Co-Plaintiffs" shall mean, collectively, Omar Rodriguez, Cindy Guillen-  
21 Gomez, Elfego Rodriguez, and Jamal Childs, co-plaintiffs in this Action.

22 6. Plaintiff's counsel of record in this Action shall use the Confidential Information  
23 solely for the purposes of Plaintiff's litigation in this Action, and shall not disclose any portion of  
24 the Confidential Information to any other person, firm or corporation except:

25 a. Bona fide employees of counsel's law offices, and then only to the extent  
26 necessary to enable said persons to assist in Plaintiff's litigation of this Action;

27  
28 <sup>1</sup> Including the Police Department of the City of Burbank (erroneously sued as an independent  
entity named "Burbank Police Department").

- b. Plaintiff, to the extent necessary for the prosecution of Plaintiff's claims in this Action;
- c. Bona fide expert witnesses employed by Plaintiff in this Action, to the extent necessary to render an expert opinion in connection with Plaintiff's claims in this Action;
- d. Court reporters, to the extent necessary to take or transcribe testimony in connection with Plaintiff's claims in this Action; and
- e. The Court, to the extent necessary for a motion or other matter pending before the Court in connection with Plaintiff's claims in this Action.

7. Plaintiff's counsel of record in this Action alone will retain the Confidential Information and at no time may a copy of any Confidential Information be made for or provided to the persons described in Paragraphs 6(a) and (b) above. Copies of Confidential Information may be made for and provided to Plaintiff's designated experts in this Action, Oliver "Lee" Drummond and R. William Mathis, Ph.D., pursuant to Paragraph 6(c) above, provided Mr. Drummond and Dr. Mathis sign the Protective Order and agree to be bound by its terms. Copies of Confidential Information provided to court reporters and/or the Court pursuant to Paragraphs 6(d) or (e) above shall be governed by and handled in accordance with Paragraph 9 below. At no time and under no circumstances may Confidential Information be disclosed or provided to any person not listed in Paragraph 6 above, or to any Co-Plaintiffs or any other party to litigation with the City (other than Plaintiff) or his/her agents or representatives, even if they fall within the categories delineated in Paragraph 6 above (such as if a party to another lawsuit becomes employed at Plaintiff's counsel's office or is a purported expert for Plaintiff).

8. All persons described in Paragraphs 6(a) through (e) above shall not disclose any portion of the Confidential Information and shall not use any information obtained therefrom except in conformance with this Protective Order and for purposes of Plaintiff's litigation in this Action. Any party who discloses Confidential Information to any person described in Paragraphs 6(a) through (d) shall advise such person that said matters constitute Confidential Information which may be used only for the litigation of this Action, and shall, prior to disclosure of the

Confidential Information, have such person execute a written Understanding and Agreement to be bound by this Stipulation for Protective Order in the form attached hereto as Exhibit 1.

9. Any deposition testimony that encompasses or concerns Confidential Information shall be transcribed in a separate booklet that is marked on its cover "Confidential: Do Not Disclose Except By Court Order." Any document that contains Confidential Information that is marked as an exhibit at a deposition shall be bound in the separate booklet marked "Confidential: Do Not Disclose Except By Court Order." Deposition transcripts containing Confidential Information and bearing this marking shall not be disclosed except as provided in Paragraph 6 above. In addition, any documents containing Confidential Information that are submitted to the Court shall be filed or lodged in a sealed envelope marked "Confidential: Subject to Protective Order."

10. Plaintiff's counsel are directed to retain all copies of documents, notes, or summaries containing Confidential Information in their custody, possession and control and to take the necessary precautions to prevent persons not authorized above from obtaining access to any such Confidential Information.

11. Production of the Confidential Information protected by this Protective Order shall not constitute a waiver of any privilege or confidentiality or privacy right. The parties retain the right to assert all substantive objections to the Confidential Information, including but not limited to relevancy, hearsay, privacy, and privilege.

12. At the conclusion of this action, all documents containing Confidential Information, all copies and extracts thereof, with the exception of those documents affected by the attorney work-product doctrine or attorney-client privilege, shall be returned to counsel for Burbank. As to those documents protected by the attorney work-product doctrine or attorney-client privilege, Plaintiff and his counsel agree that any and all such documents shall either be redacted and returned to Burbank or shall be destroyed.

1 Dated:

LAW OFFICES OF RHEUBAN & GRESSEN  
Solomon E. Gresen

2

3

By:

Solomon E. Gresen  
Attorneys for Plaintiffs OMAR  
RODRIGUEZ; CINDY GUILLEN-  
GOMEZ; STEVE KARAGIOSIAN;  
ELFEGO RODRIGUEZ; AND JAMAL  
CHILDS

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Dated:

MITCHELL SILBERBERG & KNUPP LLP  
Lawrence A. Michaels  
Veronica von Grabow

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9

10

By:

Lawrence A. Michaels  
Attorneys for Defendants and  
Cross-Complainant CITY OF BURBANK,  
including the POLICE DEPARTMENT OF  
THE CITY OF BURBANK (erroneously  
sued as an independent entity named  
"BURBANK POLICE DEPARTMENT")

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I, Oliver "Lee" Drummond, have read and understand the foregoing Stipulation For  
Protective Order Re: Confidential Information Produced By Defendant Following In Camera  
Review and agree to be bound by its terms.

18

Dated:

OLIVER "LEE" DRUMMOND

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24

I, R. William Mathis, PH.D., have read and understand the foregoing Stipulation For  
Protective Order Re: Confidential Information Produced By Defendant Following In Camera  
Review and agree to be bound by its terms.

25

Dated:

R. WILLIAM MATHIS, PH.D.

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1 **[PROPOSED] REFEREE RECOMMENDATION**

2 For good cause shown, it is recommended that the Court issue a Protective Order in  
3 accordance with the foregoing Stipulation For Protective Order Re: Confidential Information  
4 Produced By Defendant Following In Camera Review.

5  
6 DATED: \_\_\_\_\_, 2011

The Hon. DIANE WAYNE, Retired

7 By: \_\_\_\_\_

8 DIANE WAYNE  
9 Discovery Referee

10  
11  
12 **[PROPOSED] ORDER**

13  
14 The Discovery Referee's recommendation above is hereby adopted by the Court.

15 **IT IS SO ORDERED** in accordance with the foregoing Stipulation For Protective Order  
16 Re: Confidential Information Produced By Defendant Following In Camera Review.

17  
18  
19 DATED: \_\_\_\_\_, 2011

By: \_\_\_\_\_

20 THE HON. JOANNE O'DONNELL  
21 Presiding Judge



**EXHIBIT 1**

**UNDERSTANDING AND AGREEMENT PURSUANT  
TO PROTECTIVE ORDER**

I have read the Stipulation for Protective Order in *Rodriguez et al. v. Burbank Police Department et al.*, Los Angeles Superior Court Case No. BC 414602. I understand the Protective Order and agree to be bound by its terms.

Dated: 2-23-12

William M. Thomas, Chg  
(Print Name)

[Signature]  
(Signature)

## **Solomon Gresen**

---

**From:** Solomon Gresen  
**Sent:** Friday, February 24, 2012 5:18 PM  
**To:** 'Michaels, Larry'; Philip L. Reznik (preznik@brgslaw.com)  
**Cc:** Corey Hayden; Steven Rheuban  
**Subject:** Mathis Testing and Report  
**Attachments:** Email from Dr. Mathis.pdf; MMPI-2.pdf; Protective Order.pdf

Mr. Michaels and Mr. Resnick,

Dr. Mathis has returned from his vacation, and has provided me with his raw test data and report. Copies are attached.

Also, please find a copy of the protective order executed by Dr. Mathis.

Solomon E. Gresen, Esq.  
LAW OFFICES OF RHEUBAN & GRESEN  
15910 Ventura Boulevard, Suite 1610  
Encino, California 91436  
tel: 818.815.2727  
fax: 818.815.2737  
[seg@rglawyers.com](mailto:seg@rglawyers.com)  
[www.rglawyers.com](http://www.rglawyers.com)

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